

Remarks

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Entry of the above-noted amendments, reconsideration of the application, and allowance of all claims pending are respectfully requested. By this amendment, claims 1, 2, 14, 15, 17, and 19 are amended. These amendments to the claims constitute a bona fide attempt by applicant to advance prosecution of the application and obtain allowance of certain claims, and are in no way meant to acquiesce to the substance of the rejections. Support for the amendments can be found throughout the specification (e.g., page 10, line 25 to page 11, line 1) and figures (e.g., FIGS. 2-4) and thus, no new matter has been added. Claims 1-20 are pending.

Claim Rejections - 35 U.S.C. §§ 102 and 103

Claims 1, 2, 4, 5, 7, 8, 10, 11, 13, 14, 15, 17, and 19 were rejected under 35 U.S.C. § 102(e) as allegedly being anticipated by Ejzak (U.S. Patent No. 6,871,070). Claims 3, 6, 9, 13, 16, 18, and 20 were rejected under 35 U.S.C. § 103(a) as being allegedly unpatentable over Ejzak in view of Denman et al. (U.S. Patent No. 6,490,451, "Denman"). These rejections are respectfully, but most strenuously, traversed.

Applicant respectfully submits that the Office Action's citations to the applied references, with or without modification or combination, assuming, *arguendo*, that the modification or combination of the Office Action's citations to the applied references is proper, do not teach or suggest the server component that sends the one or more session initiation protocol (SIP) messages, to cause the allocation of the one or more network resources for the active call terminated to the mobile telephone without session description protocol (SDP) information, upon initiation of the handoff of the active call between the packet-switched portion of the mobile switching center and the legacy circuit mobile switching center, as recited in applicant's independent claim 1.

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For explanatory purposes, applicant discusses herein one or more differences between the claimed invention and the Office Action's citations to Ejzak and Denman. This discussion, however, is in no way meant to acquiesce in any characterization that one or more parts of the Office Action's citations to Ejzak or Denman correspond to the claimed invention.

Ejzak (column 6, lines 26-30; FIG. 1) discloses:

Circuit-switched domain 151 includes iMSC server 201, MSC server 152, GMSC server 153, and a plurality of media gateways (MGW). CS domain 151 is coupled to HSS 142 and Roaming SGW (R-SGW) 147.

Ejzak discloses the iMSC server and the MSC server, but does not disclose signaling between the iMSC server and the MSC server for a handoff. Ejzak fails to disclose the server component that sends the one or more session initiation protocol (SIP) messages, to cause the allocation of the one or more network resources for the active call terminated to the mobile telephone without session description protocol (SDP) information, upon initiation of the handoff of the active call between the packet-switched portion of the mobile switching center and the legacy circuit mobile switching center.

Accordingly, the Office Action's citation to Ejzak fails to satisfy at least one of the limitations recited in applicant's independent claim 1.

Denman (column 7, lines 4-9) discloses:

A Wireless Mobility Server (WMS) 216 presents the appearance of a single MSC/VLR to the ANSI-41 Signaling Network 230 within PCN 203. WMS 216 hides from a Call Server (CS) 214 the fact that one or more of the terminals in a call are wireless and mobile, thereby enabling utilization of an other-than-MSC-derived CS.

Denman discloses the wireless mobility server that presents the appearance of a single MSC/VLR to an ANSI-41 signaling network. Denman fails to disclose the server component that sends the one or more session initiation protocol (SIP) messages, to cause the allocation of

the one or more network resources for the active call terminated to the mobile telephone without session description protocol (SDP) information, upon initiation of the handoff of the active call between the packet-switched portion of the mobile switching center and the legacy circuit mobile switching center.

Accordingly, the Office Action's citation to Denman fails to satisfy at least one of the limitations recited in applicant's independent claim 1.

The Office Action's citations to Ejzak and Denman all fail to meet at least one of applicants' claimed features. For example, there is no teaching or suggestion in the Office Action's citations to Ejzak and Denman of the server component that sends the one or more session initiation protocol (SIP) messages, to cause the allocation of the one or more network resources for the active call terminated to the mobile telephone without session description protocol (SDP) information, upon initiation of the handoff of the active call between the packet-switched portion of the mobile switching center and the legacy circuit mobile switching center, as recited in applicants' independent claim 1.

For all the reasons presented above with reference to claim 1, claims 1, 14, and 19 are believed neither anticipated nor obvious over the art of record. The corresponding dependent claims are believed allowable for the same reasons as independent claims 1, 14, and 19, as well as for their own additional characterizations.

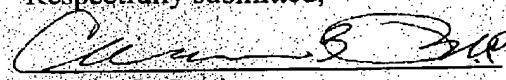
Withdrawal of the §§ 102 and 103 rejections is therefore respectfully requested.

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In view of the above amendments and remarks, allowance of all claims pending is respectfully requested. If a telephone conference would be of assistance in advancing the prosecution of this application, the Examiner is invited to call applicant's attorney.

Respectfully submitted,



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